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PORT OF PORTLAND

August 31, 2001

Tom Gainer, P.E.
Department of Environmental Quality
Northwest Region Portland Office
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

Re: Port of Portland Terminal 5 Preliminary Assessment
15540, 15550 and 15560 N. Lombard, Portland, Oregon
Portland Harbor Marine Terminal Sites

Dear Tom,

This letter is in response to your review letter dated May 15, 2001 regarding the Port of Portland's Terminal 5 Preliminary Assessment. In your letter to the Port you requested additional information prior to you being able to make a "no further action" determination for Terminal 5. The following information addresses the concerns and questions you raised.

Portland Bulk Terminal

- *Location of 1982 groundwater well installed by Riedel* – The location of this well has not been determined. After review of Oregon Department of Water Resources records, Port records and a search of the site, the location of this well could not be determined. If it is found, the well will be properly decommissioned.
- *Regional groundwater flow* – You suggested that seasonal groundwater flow direction changes should be assessed. Since installation of groundwater monitoring wells (MW-1, MW-2, MW-3 and MW-4) at Terminal 5 in 1993, the Port has determined water elevations eleven times. The results have been consistent over this period of time and it does not appear to vary by season. Based on the configuration of the existing wells (2, 3 and 4), the overall regional groundwater flow direction is difficult to interpret. Based on these three wells groundwater flows to the south – southwest. MW-4, which is closest to the river of the three wells, consistently shows a lower elevation than MW-2 and MW-3 (Hahn 1999, Table 2 - Reference [14] in 8/25/2000 T5 PA). Regional groundwater flow is expected to be generally west toward the river.

Alcatel

- *Potential residual contamination left in place* – Your letter references the 1988 Environmental Assessment and the removal of 30 cubic yards of petroleum

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contaminated soil. There are no records of confirmation samples taken after the soil was removed. The description of the contaminated soil and its extent is described in the Dames & Moore 1988. (Reference [7] in 8/25/2000 T5 PA). According to the report, Area A had a 15 by 20 foot area of contaminated soil adjacent to containers that was discolored but was limited to the upper foot of soil. Area B had an area 6 feet by 7 feet and the upper foot appeared damp and darkened from the spilled oil. Area C had apparent soil contamination in an area 2 feet by 3 feet and confined to the upper few inches where the soil was noticeably wet. As indicated in the PA, approximately 30 cubic yards of soil was removed from these areas where the Alcatel building now stands. Based on the original description of the observed soil staining, the results of samples taken prior to the removal action and the subsequent removal of the visually stained soil, it would not be likely that soil contamination remains at the site.

- *Current Waste Management Practices* – You stated that the 1991 Environmental Assessment found no significant concerns but requested current waste management practices. It appears that Alcatel manages all waste streams from their operation in a manner consistent with current regulations. The majority of the waste from Alcatel's operation is solid waste from the manufacture process of the submarine cable. Although the Port does not regularly audit tenants for environmental performance the Port is not aware of any violations, spills or other such incidents at the Alcatel property. Alcatel has been ISO 14001 certified within the last two years.

Columbia Grain

- *Current Waste Management Practices* – You stated that the 1991 Environmental Assessment found no significant concerns but requested current waste management practices. It appears that Columbia Grain manages all waste streams from their operation in a manner consistent with current regulations. A registered hauler picks up waste generated mainly from office operations, used oils get recycled off site and organic waste is put in a separate dumpster and taken off site for composting. All equipment with hydraulics and lubricants on the dock at Columbia Grain contain food grade oils as opposed to petroleum based. Although the Port does not regularly audit tenants for environmental performance the Port is not aware of any violations, spills or other such incidents at the Columbia Grain property.
- *June 10, 1993 DEQ spill response letter* – You requested information on a spill that was reported to DEQ by Norton Lilly. According to DEQ records this is a spill that occurred at Terminal 5 from the vessel Tian Tan Hai. Though DEQ's record indicates the spill occurred at T5, it does not appear that the Port of Portland or Columbia Grain was copied on the letter. After a review of all Port spill and environmental records no reference to this event was discovered. Representatives of Columbia Grain were also asked about this spill and were not aware of the incident or any follow-up. The sediments at Columbia Grain's Berth 501 have been sampled since 1993 with numerous compounds analyzed but it does not appear impacts from contaminants such as hydraulic fluid or paint are present.

I would expect that this information provided is sufficient to answer the questions you raised in your letter dated May 15, 2001. The Port requests a determination of no further action at Terminal 5 on the grounds the Preliminary Assessment has determined that the facility is not the source of contamination to the river and does not pose a threat to human health and the environment such that action would be required under ORS 465. After review please let me know your decision regarding the determination of no further action for Terminal 5. I can be reached at (503) 240-2014.

Sincerely,

A handwritten signature in black ink, appearing to read "Padraic W. Quinn", with a stylized flourish at the end.

Padraic W. Quinn
Environmental & Safety Manager
Marine Operations

Cc: Portland Bulk Terminal
Alcatel
Columbia Grain